

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

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DEC 10 2021

In re:

Supportive Health LLC,  
  
Debtor.

Case No.: 21-15113-VFP

Chapter 7

Honorable Vincent F. Papalia

Hearing Date

U.S. BANKRUPTCY COURT  
NEWARK, N.J.  
BY Robbie DEPUTY

**DECLARATION OF CARLINE BOLIVAR IN SUPPORT OF MOTION**

I, Carline Bolivar, of full age, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the principal of Supportive Health LLC ("Supportive Health"), a New Jersey LLC, and I have full knowledge of the facts set forth herein.
2. I am also an equity holder in Supportive Health LLC and party of interest in this bankruptcy.
3. I am submitting this motion *pro se*.
4. Pursuant to 11 U.S.C. § 554(b), I move the court to compel the trustee Eric Perkins to abandon the property at 3269 S New York Ave, Milwaukee, WI as the property is of inconsequential value and benefit to the estate.
5. The property at 3269 S New York Ave is encumbered by a mortgage of approximately \$180,000.
6. The property at 2229 E Eden Pl, St. Francis, WI is not encumbered by a mortgage.
7. An appraisal estimate from Realtor.com appraised the property at 220,900 (see Exhibit A).

8. I dispute the total debt claimed by the trustee as about \$80,000 of the roughly \$110,000 doubt is disputed as it is in active litigation in the Milwaukee Circuit Court (case No. Milwaukee Case No. 2020CV006391).


9. However, even if the disputed debt were counted, the sale of 2229 E Eden Pl would be more than enough to cover any debt allegedly owned by the debtor.

10. As such, the sale of 3269 S New York Ave by the Trustee would be of inconsequential value and benefit to the estate.

**11. The Trustee's purpose in a Chapter 7 bankruptcy is to pay off the debt due to the creditors. The sale of 2229 E Eden Pl is suffice to pay of all such debt.**

12. As such, the trustee should be compelled to abandon 3269 S New York Ave, Milwaukee, WI as its value is inconsequential in the estate's ability to repay its debt.

I declare under penalty of perjury that the forgoing is true and correct.

  
\_\_\_\_\_  
Carline Bolivar

DATED: December 9, 2021